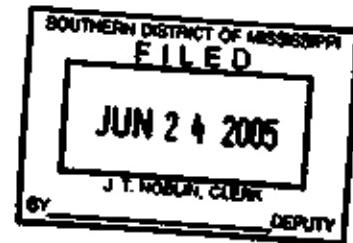


UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF  
MISSISSIPPI, JACKSON DIVISION

PLAINTIFFS

KEN ADCOCK, ESQ., THOMAS A. AGOSTINELLI,  
RITA J. ALLEN, SARAH ALLRED, HENRY DEAN  
ANDREWS, RUTHIE B. ATKINS, GENE BAGWELL,  
BAGWELL ANTIQUES, JOHN M. BAKER, TERRY O.  
BAUMANN,, CHRISTOPHER BELL,, BOB BENNETT,,  
ARTIS & MARILYN BOLDEN,, LEON BOONE,,  
JOHNNY FRANKLIN BOX,, GENE BRADFORD,, G.W.  
(JERRY) BROOKS,, JO M. BROWN,, LATANYA  
BROWN,, JAMES S. BROWN JR., JAMES S. BROWN  
JR., DBA CLASSIC HOMES INC.,, THOMAS O.  
BUCKNER,, MILDRED L. BUERKLE,, GANSIYAM  
(GREG) BULCHANDANI,, CHRIS BURGESS,,  
RHONDA BURLEY,, MABLE G. BUTLER,, JAMES W.  
BUTLER, ESQ., ATLEY V BYNUM,, GERA H  
BYNUM,, YERGER PROPERTIES LP C/O WIRT  
YERGER III,, RICHARD YERGER C/O WIRT  
YERGER III,, WIRT A. YERGER IV C/O WIRT  
YERGER III,, JAMES DAVID YERGER C/O WIRT  
YERGER III,, JOHN YERGER C/O WIRT YERGER III,,  
SUSAN CAINE,, TOM P. CALDWELL,, CLIFFORD  
CAMP,, CHRISTINA CAMP,, CLIFFORD B. "TREY"  
CAMP, L.L.C., WINSTON CANTRELL,, SAMUEL A.  
CAROLLO,, SHANTEL CARTER,, CHARLES A.  
CASCIO,, CHARLES S. & ELENA CASCIO,, ELENA R.  
CASCIO,, RETA C. CHANDLER,, DANNY R.  
CHANDLER,, JIMMY CLARK,, LINDA COCKRELL,,  
J.B. & LORIA ANN COLEMAN,, ROMOLA G.  
COLSON,, JOSEPH CONN,, ANTHONY G. COOK,,  
BILLY D. & FRANCES V. COOK,, DELLA COOPER,,  
MARILYN COTHREN,, SOPHIA V. COX,,  
MARGARET CROWDER,, RUTH G.  
CUNNINGHAM,, FRED M. & MARGIE F.  
CUNNINGHAM,, FRED M. CUNNINGHAM JR.,, BILL  
H. DAVIS,, SUE V. DAVIS,, R. LEE DAVIS,, VALERIE  
MARTIN DAVIS,, DEBBIE ANN DEAN (BAKER),,  
RICIARD DECKER,, ROBERT DOHERTY,, LILLIAN  
DOZIER,, ROWENA DRINKWATER & RITA &  
HELEN HOGUE,, WILLIAM A. DUNIGAN,, SABRINA  
C. ELDER,, WILLIAM (DRAKE) ELDER,, MARY



3:05cv393HTW-JCS

MAXINE EZELLE,, J. FREDERICK FARRELL,,  
HENRY W. FLOWERS,, LINNIE M. FLOWERS,,  
GEORGE G. FLOWERS, JR., GARY FLUM,, JAMES  
O. FORD ESQ.,, LARRY D. FOSTER,, BILLIE  
FULLER,, D. CURTIS GARNER,, ROOSEVELT  
GENTRY,, SANDRA STURGIS GIDDENS,, JOHN D.  
GIDDENS,, WILLIAM BOBBY GILL, III, ESQ.,,  
EDWARD DON GOOLSBY,, RUSSELL & JANICE L.  
GRANT,, RODGER D. & L. SUE GREGORY,, THOMAS  
Y. & LYNN R. GUNTER,, THOMAS Y. GUNTER,,  
RUTH LYNN R. GUNTER,, THOMAS GUNTER, C/F  
ERIN HUTSON,, RONNIE & JEANETTE HALL,,  
JAMES HALL,, JAMES A. & BETTY R. HALL,,  
EUGENE HALL,, JAMES A. HALL (INDIV.),, KENNIS  
HARRIS,, CALVIN A. AND PAMELA HART,, AVIS  
HEATH,, LINDA L. HESTER,, KATRINA HICKS,,  
JOHN H. & EVA HINES,, FREDERICK & REGINIA  
HOBSON,, JOHN HOLLINGSWORTH,, BUFORD D.  
HOLLINGSWORTH,, CARL G. HOLLOWAY,, W.  
BRIGGS HOPSON JR.,, CONNIE HUDSON,, JAMES W.  
HUNT,, GARY HUTSON, C/F KYLE HUTSON,, JOHN  
JABOUR,, BEVERLY ELLIS JACKSON,, MATTIE  
JAMES,, ELTON J. & JANETTE JERLS,, RODERICK  
JOHNSON,, THOMAS E. JOHNSON,, WALTER O.  
JONES,, HUGH E. JONES,, LOUISE JURGENS,, JEFF  
KEMP,, HENRY KING,, MICHAEL KING, C/F  
CHRISTY L. KING,, MICHAEL KING, C/F STEVEN  
KING,, AUSTRY KIRKLIN,, MAGGIE KNIGHT,, KIRK  
G. LADNER,, MARTHA B. LAMPE,, ERIC LENNEP,,  
MADALAN G. LENNEP,, HELEN R. LEWIS,, JAY R.  
LEWIS,, ROSALIND LIPSCOMB,, LEONARD V.  
LOCKLEY JR.,, JANICE GRANT ADMINISTRATRIX,,  
JOHN M. LOTT JR.,, ROBERT LOVE,, EDWARD H.  
LOWE,, CHARLES ERIC MALOUF,, WILLIAM  
(BILLY) MANN, DBA MID SOUTH TRADING,,  
PRECIOUS & CRYSTAL MARTIN,, STEPHON  
MASON,, GREGORY MAYFIELD,, WILLIAM S.  
MCDANIEL,, BERT T. MCDANIEL,, CHERA E.  
MCDANIEL,, JOHN L. MILEY,, CAROLYN MILLER,,  
MONROE MILLER,, SUSAN MILLER,, BLAKLEE D.  
MILLER,, JOSEPH CHRIS MILLER,, WILLIAM L.  
MILSTEAD,, JOHN H. & BETTY ANN MOODY,,  
DONALD MOORE,, MAURINE MOORE,, BOBBIE  
MORTIMER,, JAMES T. MOSER, SR.,, ISADORE

MYERS,, DAVID H. MYERS,, JERRY E. NICHOLS,,  
TIM NORRIS,, JANEAN(ESQ) & LARRY PACIFIC,,  
JIMMY PAINTER,, CHRIS & MARGIE PARKER,,  
LINDA D. PARKER,, LOU PARKER,, KAMLESH  
PATEL,, JOHN W. PATRICK,, WILLIAM C. PEOPLES,,  
WILLIAM W. PERKINS,, SHANNON W. PIGOTT,,  
HERMAN H. PINER,, MELVIN & ELIZABETH C.  
PRIESTER,, JOE PULLEN,, THOMAS M. (TOM)  
PURNELL,, BARCLAY & JAN RADER,, GERALD  
RALIEGH,, HOWARD T. RICHARDSON,, RICHARD  
THOMAS RODENBAUGH,, ALLAN S. ROHR,,  
DAROLD RUTLAND,, SHIRLEY RUTLAND,, KEVIN  
SANDERS,, MARY M. SAVELL,, J.D. SHAFFER,,  
JASON LEE SHELTON,, LASHANE SMITH,, MARK  
SMITH,, MARILYN ANN SMITH,, JOHN ERIC  
SMITH,, ELVIN SMITH,, TOMMY & JAN SMITH,,  
REGINALD & DONNA SMITH,, RITA BARTLOW  
SMITH,, LELAND A. SPEED, DBA SPEED CORP.,  
JOHN E. (BUDDY) SPRING,, FREDERICK STANTON,,  
ANDY & KAREN STONE,, JOSPEH G. STRICKLAND,,  
EDITH STRUB,, ERICH M. STURGIS,, GEORGE M.  
STURGIS,, YVETTE N. STURGIS,, ROBERT S.  
TARVER,, CECIL THOMAS,, V. T. "BILL" VALLAS,,  
J. LYN VALLAS,, WYNDELL A. VARNER,, JAMES  
AND HELEN WALKER,, JOHN L. & STELLA  
WALKER,, EDWARD K. WALKER,, RICKY  
WARNER,, JANET WATKINS,, KATHERIN &  
CLARICE WEATHERBY,, KENNETH WEBB,, DAVID  
O. WEED,, JOHN M. WELLONS JR.,, THEODORE  
WEST,, JON S. WIDENER,, HOSIE, BY JANET S.  
WIGGS,, JOHNNY F. WIGINTON,, JAMES G.  
WILLIAMS,, SUSAN WILLIAMS,, ROY E.  
WILLIAMS,, ROBERT WILLIAMS JR.,, KATRINA  
WILLIAMS, C/F FRANKLIN D. WILLIAMS,, KATRINA  
WILLIAMS, C/F JESSICA WILLIAMS,, KATRINA &  
ERMA WILLIAMS/BOLTON, DIANNE WILSON,,  
MARCUS WITHERS, (B&T MOM RITA WITHERS,,  
AMANDA AND MARK WOOTTON,, JOHN  
YARBROUGH,, GENE ABBOTT,, LARRY ANDREWS,,  
GUSSIE ASHLEY,, JEANNE & JERRY BARRIER,,  
DIANA BONDS,, TALMADGE BRADDOCK,,  
SUZANNE JACKSON BRADDOCK,, A.R. BROWNLEE,,  
MARY BRYANT,, JOSEPH W. BURNETT,, KELSIE  
CAREY,, BROOKS CHEATHAM,, ROBERT

CHRISTIAN,, CURTIS COCKRELL,, WOODY P.  
DAVIS,, VIRGIE B. DAVIS,, TONY DICUS,, DAVID  
DUNCAN,, JOHN EAVES, JR., MICHAEL  
ENGLE,, LYNN FEATHERLY,, DENNIS K. FLYNN,,  
HUGH B. FRENCH,, JOCELYN GIBSON,, ERIC  
GILKEY,, HORACE GRANTHAM,, CEDRICK  
GRIZZELL,, CHUCK GUESS,, SHIRLEY GUSSIO,,  
CAROLINA CAMPBELL HALL,, SYLVIA CHAPMAN  
HALL,, CHARLES HALL,, FAYE & TOMMY  
HILL,, INDIA HOLLINGSWORTH,, JOHN  
HUNSBERGER,, VINCENT HUNT,, GLORIA  
JOHNSON,, BARBARA JOHNSON,, VANESSA T.  
JOHNSON,, FRANKLIN JOHNSON,, LEWIS  
JOHNSON,, EDWARD JUSSLEY,, JOE KUSE,,  
MARCUS LEWIS,, GWENDOLYN LOPER,, WAYNE  
MARTIN,, CHAD MASK,, NICHOLAS MCCALIP,,  
ROSE MCGOWAN,, A.J. MCGREGOR,, ALBERT  
METTS, SANDRA MITCHELL,, JOHN Q. MORGAN,,  
MICHAEL WAYNE MURPHREE,, DON NATIONS,,  
ETHYL PARKES,, SHARON PICKERING,, LINDA  
PILGRIM,, HERBERT RUBIN,, JEAN SAIN,, JERRY  
SANDIFER,, JONATHON SHELTON,, JIMMY D.  
SHELTON,, KARSTEN SIMRALL,, LONNIE MIKE  
SMITH,, NEAL SMITH,, JACKIE SOPER,, BAKER  
TADLOCK,, VIRGINIA THOMAS,, JOHN THOMAS,,  
SCOTT THOMPSON,, PATSY TURNER,, TODD  
WATKINS,, HENRY WHITFIELD,, BARBARA  
WILLIAMS,, ALBERT WILSON,, MARY QUANA  
WINDERS,

VERSUS

CIVIL ACTION NO. 3:05-cv-00393-HTW-JCS

BERNARD J. EBBERS, SCOTT D. SULLIVAN  
DAVID F. MYERS, BUFORD YATES, JR.,  
JOHN SIDMORE, JAMES C. ALLEN,  
JUDITH AREEN, MAX E. BOBBITT,  
FRANCESCO GALESI, STILES A. KELLETT, JR.,  
ARTHUR ANDERSON, L.L.P., ANDERSEN UK,  
ANDERSON WORLDWIDE SC, MARK SCHOPPET,  
MELVIN DICK, SALOMON SMITHY BARNEY, INC.,  
CITIGROUP, INC., JACK GRUBMAN, SANFORD  
WEILL, J.P. MORGAN CHASE & CO., J.P. MORGAN  
SECURITIES INC., BANK OF AMERICA CORP.,

DEFENDANTS

**BANK OF AMERICA SECURITIES, LLC, ABN AMRO  
INC., DEUTSCHE BANK AG, DEUTSCHE BANK  
ALEX. BROWN INC., JOHN DOES ONE through  
TEN and JOHN DOES ELEVEN through TWENTY**

**ORIGINAL COMPLAINT**

Plaintiffs join together and bring this Complaint against the hereinafter-designated defendants, and in support thereof respectfully represents as follows:

**I. Introduction**

1. Clinton, Mississippi-based WorldCom, Inc. ("WorldCom") falsified approximately thirteen (13) billion in purported earnings in its financial statements for 1999, 2000, 2001 and the first quarter of 2002 by means of a greed-ridden conspiracy designed to artificially inflate the price of its own stock and unjustly enrich a select few.

2. WorldCom, Inc. filed for bankruptcy protection on July 26, 2002.

Attached hereto and marked as "Exhibit A" is Dick Thornberg's Third and Final report to the Bankruptcy Commissioner.

3. Plaintiffs, all of who own or recently sold WorldCom stock, invoke the protection of Federal law, Mississippi law and the jurisdiction of this court to hold the responsible parties accountable for their fraudulent and/or reckless actions.

**II. Plaintiffs**

4. Plaintiff Ken Adecock, Esq. is an adult resident citizen of Hinds County, Mississippi whose address is 5375 Carolwood Dr., Jackson, MS.

5. Plaintiff Thomas A. Agostinelli is an adult resident citizen of Coahoma County, Mississippi whose address is P.O. Box 25, Lyon, MS.

6. Plaintiff Rita J. Allen is an adult resident citizen of Rankin County, Mississippi whose address is 112 Oakdale Circle, Brandon, MS.

7. Plaintiff Sarah Allred is an adult resident citizen of Warren County, Mississippi whose address is 3808 Halls Ferry Rd., Vicksburg, MS.

8. Plaintiff Henry Dean Andrews is an adult resident citizen of Warren County, Mississippi whose address is 4109 Woodland Circle, Vicksburg, MS.

9. Plaintiff Ruthie B. Atkins is an adult resident citizen of Hinds County, Mississippi whose address is 1200 Cliffdale Dr., Clinton, MS.

10. Plaintiff Gene Bagwell is an adult resident citizen of Hinds County, Mississippi whose address is 5607 Concord Drive, Jackson, MS.

11. Plaintiff Bagwell Antiques is a Mississippi corporation domiciled in Hinds County, Mississippi whose address is 5607 Concord Drive, Jackson, MS.

12. Plaintiff John M. Baker is an adult resident citizen of Lee County, Mississippi whose address is 156 Cobb Ave., Tupelo, MS.

13. Plaintiff Terry O. Baumann is an adult resident citizen of Madison County, Mississippi whose address is 516 Mobile Estates Dr., Ridgeland, MS.

14. Plaintiff Christopher Bell is an adult resident citizen of Hinds County, Mississippi whose address is 504 North Park Ln, Jackson, MS.

15. Plaintiff Bob Bennett is an adult resident citizen of Lee County, Mississippi whose address is P.O. Box 2153, Tupelo, MS.

16. Plaintiffs Artis & Marilyn Bolden are adult resident citizens of Hinds County, Mississippi whose address is P.O. Box 9643, Jackson, MS.

17. Plaintiff Leon Boone is an adult resident citizen of Rankin County, Mississippi whose address is 103 Willow Lane, Florence, MS.
18. Plaintiff Johnny Franklin Box is an adult resident citizen of Madison County, Mississippi whose address is P. O. Box 1851, Ridgeland, MS.
19. Plaintiff Gene Bradford is an adult resident citizen of Madison County, Mississippi whose address is 205 Oxford Pl., Ridgeland, MS.
20. Plaintiff G.W. (Jerry) Brooks is an adult resident citizen of Madison County, Mississippi whose address is 147 Wheatley Pl., Ridgeland, MS.
21. Plaintiff Jo M. Brown is an adult resident citizen of Madison County, Mississippi whose address is 207 Devander Run, Ridgeland, MS.
22. Plaintiff Latanya Brown is an adult resident citizen of Rankin County, Mississippi whose address is 709 Southern Oaks Drive, Florence, MS.
23. Plaintiff James S. Brown Jr. is an adult resident citizen of Madison County, Mississippi whose address is 207 Devander Run, Ridgeland, MS.
24. Plaintiff James S. Brown Jr., DBA Classic Homes Inc. is an adult resident citizen of Madison County, Mississippi whose address is 207 Devander Run, Ridgeland, MS.
25. Plaintiff Thomas O. Buckner is an adult resident citizen of Madison County, Mississippi whose address is 101 Greensview St., Madison, MS.
26. Plaintiff Mildred L. Buerkle is an adult resident citizen of Hancock County, Mississippi whose address is #4 Whispering Branch, Diamondhead, MS.

27. Plaintiff Ganshyam (Greg) Bulchandani is an adult resident citizen of Rankin County, Mississippi whose address is 203 Wisteria Ct., Flowood, MS.
28. Plaintiff Chris Burgess is an adult resident citizen of Madison County, Mississippi whose address is 202 Bellwether Pass, Ridgeland, MS.
29. Plaintiff Rhonda Burley is an adult resident citizen of Hinds County, Mississippi whose address is 1155 Valley St., Jackson, MS.
30. Plaintiff Mable G. Butler is an adult resident citizen of Hinds County, Mississippi whose address is 4215 Brussels Drive, Jackson, MS.
31. Plaintiff James W. Butler, Esq. is an adult resident citizen of Fulton County, Georgia whose address is 3343 Peachtree Rd., East Tower Suite 1150, Atlanta, GA.
32. Plaintiff Atley V Bynum is an adult resident citizen of Scott County, Mississippi whose address is 1941 Morton Marathon, Morton, MS.
33. Plaintiff Gera II Bynum is an adult resident citizen of Scott County, Mississippi whose address is 1941 Morton Marathon, Morton, MS.
34. Plaintiff Yerger Properties LP c/o Wirt Yerger III is a Mississippi corporation domiciled in Hinds County, Mississippi whose address is P.O. Box 16910, Jackson, MS.
35. Plaintiff Richard Yerger c/o Wirt Yerger III is an adult resident citizen of Hinds County, Mississippi whose address is P.O. Box 16910, Jackson, MS.
36. Plaintiff Wirt A. Yerger IV c/o Wirt Yerger III is an adult resident citizen of Hinds County, Mississippi whose address is P.O. Box 16910, Jackson, MS.

37. Plaintiff James David Yerger c/o Wirt Yerger III is an adult resident citizen of Hinds County, Mississippi whose address is P.O. Box 16910, Jackson, MS.

38. Plaintiff John Yerger c/o Wirt Yerger III is an adult resident citizen of Hinds County, Mississippi whose address is P.O. Box 16910, Jackson, MS.

39. Plaintiff Susan Caine is an adult resident citizen of Baldwin County, Alabama whose address is 10 Sailor's Cove, Spanish Fort, AL.

40. Plaintiff Tom P. Caldwell is an adult resident citizen of Forrest County, Mississippi whose address is 2 Old Augusta Lane, Hattiesburg, MS.

41. Plaintiff Clifford Camp is an adult resident citizen of Leflore County, Mississippi whose address is 713 Olivia St., Greenwood, MS.

42. Plaintiff Christina Camp is an adult resident citizen of Leflore County, Mississippi whose address is 713 Olivia St., Greenwood, MS.

43. Plaintiff Clifford B. "Trey" Camp, III is an adult resident citizen of Bolivar County, Mississippi whose address is 410 Bishop Road, Apt 316, Cleveland, MS.

44. Plaintiff Winston Cantrell is an adult resident citizen of Union County, Mississippi whose address is 206 Magnolia Drive, New Albany, MS.

45. Plaintiff Samuel A. Carollo is an adult resident citizen of Grenada County, Mississippi whose address is 36 Northwood Drive, Grenada, MS.

46. Plaintiff Shantel Carter is an adult resident citizen of Hinds County, Mississippi whose address is 552 Springridge Rd. Apt. O-5, Clinton, MS.

47. Plaintiff Charles A. Cascio is an adult resident citizen of Bolivar County, Mississippi whose address is 627 N. Bayou Rd., Apt. C, Cleveland, MS.

48. Plaintiffs Charles S. & Elena Cascio are adult resident citizens of Washington County, Mississippi whose address is 2021 Feltus Rd., Leland, MS.

49. Plaintiff Elena R. Cascio is an adult resident citizen of Washington County, Mississippi whose address is 204 Feltus Rd., Leland, MS.

50. Plaintiff Reta C. Chandler is an adult resident citizen of Madison County, Mississippi whose address is 505 McClaurin Street, Madison, MS.

51. Plaintiff Danny R. Chandler is an adult resident citizen of Madison County, Mississippi whose address is 505 McClaurin Street, Madison, MS.

52. Plaintiff Jimmy Clark is an adult resident citizen of Lawrence County, Mississippi whose address is 290 Holmesville Road, Jayess, MS.

53. Plaintiff Linda Cockrell is an adult resident citizen of Holmes County, Mississippi whose address is P.O. Box 594, Tchula, MS.

54. Plaintiffs J.B. & Loria Ann Coleman are adult resident citizens of Hinds County, Mississippi whose address is 6445 Northwoods Pl, Jackson, MS.

55. Plaintiff Romola G. Colson is an adult resident citizen of Greene County, Alabama whose address is 103 Pickens Street, Eutaw, AL.

56. Plaintiff Joseph Conn is an adult resident citizen of Lawrence County, Mississippi whose address is 277 Frog Ridge Rd., Jayess, MS.

57. Plaintiff Anthony G. Cook is an adult resident citizen of Hinds County, Mississippi whose address is 315 Royal Oak Drive, Clinton, MS.

58. Plaintiffs Billy D. & Frances V. Cook are adult resident citizens of Rankin County, Mississippi whose address is 205 Donna Circle, Richland, MS.

59. Plaintiff Della Cooper is an adult resident citizen of Hinds County, Mississippi whose address is 270 Somerset Lane, Jackson, MS.
60. Plaintiff Marilyn Cotheren is an adult resident citizen of East Baton Rouge Parish County, Louisiana whose address is 6326 Snowden Dr., Baton Rouge, LA.
61. Plaintiff Sophia V. Cox is an adult resident citizen of Rankin County, Mississippi whose address is P. O. Box 4444, Brandon, MS.
62. Plaintiff Margaret Crowder is an adult resident citizen of Hinds County, Mississippi whose address is 106 Muriel Dr., Clinton, MS.
63. Plaintiff Ruth G. Cunningham is an adult resident citizen of Hinds County, Mississippi whose address is 1155 Valley St., Jackson, MS.
64. Plaintiffs Fred M. & Margie F. Cunningham are adult resident citizens of Hinds County, Mississippi whose address is 1155 Valley St., Jackson, MS.
65. Plaintiff Fred M. Cunningham Jr. is an adult resident citizen of Hinds County, Mississippi whose address is 1155 Valley St., Jackson, MS.
66. Plaintiff Bill H. Davis is an adult resident citizen of Alcorn County, Mississippi whose address is 1205 Pine Rd., Corinth, MS.
67. Plaintiff Sue V. Davis is an adult resident citizen of Hinds County, Mississippi whose address is 25 Avery Cr., Jackson, MS.
68. Plaintiff R. Lee Davis is an adult resident citizen of Hinds County, Mississippi whose address is 25 Avery Cr., Jackson, MS.
69. Plaintiff Valerie Martin Davis is an adult resident citizen of Hinds County, Mississippi whose address is 4527 Redwood Dr, Jackson, MS.

70. Plaintiff Debbie Ann Dean (Baker) is an adult resident citizen of Lauderdale County, Mississippi whose address is 8997 Lockhart Trailer Court Rd., Meridian, MS.

71. Plaintiff Richard Decker is an adult resident citizen of Fulton County, Georgia whose address is 950 E. Paces Ferry Road Suite 1575, Atlanta, Ga.

72. Plaintiff Robert Doherty is an adult resident citizen of Copiah County, Mississippi whose address is 151 W. Gallatin St., Hazlehurst, MS.

73. Plaintiff Lillian Dozier is an adult resident citizen of Hinds County, Mississippi whose address is 542 Whitegate Drive, Jackson, MS.

74. Plaintiffs Rowena Drinkwater, Rita & Helen Hogue are adult resident citizens of Hinds County, Mississippi whose address is 107 Camp Garaywa Rd.. Clinton, MS.

75. Plaintiff William A. Dunigan is an adult resident citizen of Rankin County, Mississippi whose address is 378 Gatewood Dr., Pearl, MS.

76. Plaintiff Sabrina C. Elder is an adult resident citizen of Madison County, Mississippi whose address is 190 Rolling Meadows Rd., Ridgeland, MS.

77. Plaintiff William (Drake) Elder is an adult resident citizen of Madison County, Mississippi whose address is 190 Rolling Meadows Rd., Ridgeland, MS.

78. Plaintiff Mary Maxine Ezelle is an adult resident citizen of Lee County, Mississippi whose address is 1004 Tyler Drive, Tupelo, MS.

79. Plaintiff J. Frederick Farrell is an adult resident citizen of Warren County, Mississippi whose address is 105 Woodbine Drive, Vicksburg, MS.

80. Plaintiff Henry W. Flowers is an adult resident citizen of Hinds County, Mississippi whose address is 12 Lafayette Cr., Clinton, MS.

81. Plaintiff Linnie M. Flowers is an adult resident citizen of Hinds County, Mississippi whose address is 12 Lafayette Cr., Clinton, MS.

82. Plaintiff George G. Flowers, Jr. is an adult resident citizen of Coahoma County, Mississippi whose address is 844 Stiles Street, Clarksdale, MS.

83. Plaintiff Gary Flum is an adult resident citizen of Lincoln County, Mississippi whose address is 1228 Rollinghills Avenue, NE, Brookhaven, MS.

84. Plaintiff James O. Ford Esq. is an adult resident citizen of Lee County, Mississippi whose address is P.O. Box 1661, Tupelo, MS.

85. Plaintiff Larry D. Foster is an adult resident citizen of Lincoln County, Mississippi whose address is P.O. Box 2, Brookhaven, MS.

86. Plaintiff Billie Fuller is an adult resident citizen of Hinds County, Mississippi whose address is 2718 South Norrel Road, Bolton, MS.

87. Plaintiff D. Curtis Garner is an adult resident citizen of Rankin County, Mississippi whose address is 105 Turtle Creek Dr., Brandon, MS.

88. Plaintiff Roosevelt Gentry is an adult resident citizen of Hinds County, Mississippi whose address is 5950 Huntview Drive, Jackson, MS.

89. Plaintiff Sandra Sturgis Giddens is an adult resident citizen of Hinds County, Mississippi whose address is 3831 Sleepy Hollow Drive, Jackson, MS.

90. Plaintiff John D. Giddens is an adult resident citizen of Hinds County, Mississippi whose address is 3831 Sleepy Hollow Drive, Jackson, MS.

91. Plaintiff William Bobby Gill, III, Esq. is an adult resident citizen of Hinds County, Mississippi whose address is 105 North State St., Jackson, MS.

92. Plaintiff Edward Don Goolsby is an adult resident citizen of Forrest County, Mississippi whose address is 307 Westlake Rd., Hattiesburg, MS.

93. Plaintiffs Russell & Janice L. Grant are adult resident citizens of Hinds County, Mississippi whose address is 1818 Aztec Dr., Jackson, MS.

94. Plaintiffs Rodger D. & L. Sue Gregory are adult resident citizens of Lake County, Florida whose address is 1831 Madero Dr., The Villages, FL.

95. Plaintiffs Thomas Y. & Lynn R. Gunter are adult resident citizens of Hinds County, Mississippi whose address is 101 Hickory Hills Dr., Clinton, MS.

96. Plaintiff Thomas Y. Gunter is an adult resident citizen of Hinds County, Mississippi whose address is 101 Hickory Hills Dr., Clinton, MS.

97. Plaintiff Ruth Lynn R. Gunter is an adult resident citizen of Hinds County, Mississippi whose address is 101 Hickory Hills Dr., Clinton, MS.

98. Plaintiff Thomas Gunter, C/I: Erin Hutson is an adult resident citizen of Hinds County, Mississippi whose address is 101 Hickory Hills Dr., Clinton, MS.

99. Plaintiffs Ronnie & Jeanette Hall are adult resident citizens of Monroe County, Mississippi whose address is 20087 Cypress Gardens, Aberdeen, MS.

100. Plaintiff James Hall is an adult resident citizen of Rankin County, Mississippi whose address is 412 Chardonnay Cr., Brandon, MS.

101. Plaintiffs James A. & Betty R. Hall are adult resident citizens of Warren County, Mississippi whose address is 22 Bee Line Rd., Vicksburg, MS.

102. Plaintiff Eugene Hall is an adult resident citizen of Warren County, Mississippi whose address is 22 Bee Line Rd., Vicksburg, MS.
103. Plaintiff James A. Hall (Indiv.) is an adult resident citizen of Warren County, Mississippi whose address is 22 Bee Line Rd., Vicksburg, MS.
104. Plaintiff Dennis Harris is an adult resident citizen of Copiah County, Mississippi whose address is 112 Beacham St., Hazlehurst, MS.
105. Plaintiffs Calvin A. and Pamela Hart are adult resident citizens of Rankin County, Mississippi whose address is 49 Sunline Dr., Brandon, MS.
106. Plaintiff Avis Heath is an adult resident citizen of Hinds County, Mississippi whose address is 4801 South Autumn Woods #403, Jackson, MS.
107. Plaintiff Linda L. Hester is an adult resident citizen of Tishomingo County, Mississippi whose address is P.O. Box 54, Luka, MS.
108. Plaintiff Katrina Hicks is an adult resident citizen of Copiah County, Mississippi whose address is 605 North Jackson St., Crystal Springs, MS.
109. Plaintiffs John H. & Eva Hines are adult resident citizens of Yazoo County, Mississippi whose address is 169 Lake City Road, Yazoo City, MS.
110. Plaintiffs Frederick & Reginia Hobson are adult resident citizens of Madison County, Mississippi whose address is 169 Brookstone Way, Madison, MS.
111. Plaintiff John Hollingsworth is an adult resident citizen of Jackson County, Mississippi whose address is 9912 Mockingbird Cr., Ocean Springs, MS.
112. Plaintiff Buford D. Hollingsworth is an adult resident citizen of Warren County, Mississippi whose address is 126 Westwood Dr., Vicksburg, MS.

113. Plaintiff Carl G. Holloway is an adult resident citizen of Simpon County, Mississippi whose address is 1481 Wade Patrick Road, Braxton, MS.

114. Plaintiff W. Briggs Hopson Jr. is an adult resident citizen of Warren County, Mississippi whose address is 2100 Hwy 61 N., Vicksburg, MS.

115. Plaintiff Connie Hudson is an adult resident citizen of Hinds County, Mississippi whose address is 1873 Longwood Dr., Jackson, MS.

116. Plaintiff James W. Hunt is an adult resident citizen of Rankin County, Mississippi whose address is 3880 Flowood Drive, Flowood, MS.

117. Plaintiff Gary Hutson, C/F Kyle Hutson is an adult resident citizen of Hinds County, Mississippi whose address is 101 Hickory Hills Dr., Clinton, MS.

118. Plaintiff John Jabour is an adult resident citizen of Warren County, Mississippi whose address is 1103 Main St, Vicksburg, MS.

119. Plaintiff Beverly Ellis Jackson is an adult resident citizen of Forrest County, Mississippi whose address is 48 Brock Rd., Hattiesburg, MS.

120. Plaintiff Mattie James is an adult resident citizen of Holmes County, Mississippi whose address is P. O. Box 700, Lexington, MS.

121. Plaintiffs Elton J. & Janette Jerls are adult resident citizens of Warren County, Mississippi whose address is 3700 Halls Ferry Rd., Vicksburg, MS.

122. Plaintiff Roderick Johnson is an adult resident citizen of Collin County, Texas whose address is 2300 Kathryn Lane #321, Plano, TX.

123. Plaintiff Thomas E. Johnson is an adult resident citizen of Madison County, Mississippi whose address is 121 Hickory Glen, Madison, MS.

124. Plaintiff Walter O. Jones is an adult resident citizen of Madison County, Mississippi whose address is 465 Highway 49 North, Flora, MS.

125. Plaintiff Hugh E. Jones is an adult resident citizen of Rankin County, Mississippi whose address is 215 Bellaire Dr., Pearl, MS.

126. Plaintiff Louise Jurgens is an adult resident citizen of Hinds County, Mississippi whose address is 860 Winn Street, Jackson, MS.

127. Plaintiff Jeff Kemp is an adult resident citizen of Simpson County, Mississippi whose address is 1320 Shivers Rd., Pinola, MS.

128. Plaintiff Henry King is an adult resident citizen of Lee County, Mississippi whose address is 1560 Sims Gin Rd, Tupelo, MS.

129. Plaintiff Michael King, C/F Christy L. King is an adult resident citizen of Hinds County, Mississippi whose address is 101 Hickory Hills Dr., Clinton, MS.

130. Plaintiff Michael King, C/F Steven King is an adult resident citizen of Hinds County, Mississippi whose address is 101 Hickory Hills Dr., Clinton, MS.

131. Plaintiff Austry Kirklin is an adult resident citizen of Holmes County, Mississippi whose address is P.O. Box 387, Lexington, MS.

132. Plaintiff Maggie Knight is an adult resident citizen of Hinds County, Mississippi whose address is 723 Beaverbrook Dr., Jackson, MS.

133. Plaintiff Kirk G. Ladner is an adult resident citizen of Madison County, Mississippi whose address is 138 Bridgewater Crossing, Ridgeland, MS.

134. Plaintiff Martha B. Lampe is an adult resident citizen of Pike County, Mississippi whose address is 105 Cedar Ridge Rd., McComb, MS.

135. Plaintiff Eric Lennep is an adult resident citizen of Madison County, Mississippi whose address is 157 Chapel Ln, Madison, MS.

136. Plaintiff Madalan G. Lennep is an adult resident citizen of Madison County, Mississippi whose address is 157 Chapel Ln, Madison, MS.

137. Plaintiff Helen R. Lewis is an adult resident citizen of Hinds County, Mississippi whose address is 1417 Fontaine Drive, Jackson, MS.

138. Plaintiff Jay R. Lewis is an adult resident citizen of Hinds County, Mississippi whose address is 1417 Fontaine Drive, Jackson, MS.

139. Plaintiff Rosalind Lipscomb is an adult resident citizen of Hinds County, Mississippi whose address is 5130 Millwood Pl., Jackson, MS.

140. Plaintiff Leonard V. Lockley Jr., Janice Grant Administratrix is an adult resident citizen of Hinds County, Mississippi whose address is 1818 Aztec Dr., Jackson, MS.

141. Plaintiff John M. Lott Jr. is an adult resident citizen of Forrest County, Mississippi whose address is 620 South 28th Ave #521, Hattiesburg, MS.

142. Plaintiff Robert Love is an adult resident citizen of Hinds County, Mississippi whose address is 5822 Canton Park Drive, Jackson, MS.

143. Plaintiff Edward H. Lowe is an adult resident citizen of Hinds County, Mississippi whose address is P. O. Box 908, Taylorsville, MS.

144. Plaintiff Charles Eric Malouf is an adult resident citizen of Madison County, Mississippi whose address is 607 Abbots Lane, Ridgeland, MS.

145. Plaintiff William (Billy) Mann, dba Mid South Trading is an adult resident citizen of Hinds County, Mississippi whose address is P.O. Box 5373, Jackson, MS.

146. Plaintiffs Precious & Crystal Martin are adult resident citizens of Hinds County, Mississippi whose address is 4514 Parisian, Jackson, MS.

147. Plaintiff Stephon Mason is an adult resident citizen of Forrest County, Mississippi whose address is 102 Fox Terrace, Hattiesburg, MS.

148. Plaintiff Gregory Mayfield is an adult resident citizen of Warren County, Mississippi whose address is 329 Silver Creek Drive, Vicksburg, MS.

149. Plaintiff William S. McDaniel is an adult resident citizen of Madison County, Mississippi whose address is 880 William Boulevard #115, Ridgeland, MS.

150. Plaintiff Bert T. McDaniel is an adult resident citizen of Smith County, Mississippi whose address is P. O. Box 86, Raleigh, MS.

151. Plaintiff Chera E. McDaniel is an adult resident citizen of Smith County, Mississippi whose address is P. O. Box 86, Raleigh, MS.

152. Plaintiff John L. Miley is an adult resident citizen of Hinds County, Mississippi whose address is 2425 N. Davis Rd., Bolton, MS.

153. Plaintiff Carolyn Miller is an adult resident citizen of Hinds County, Mississippi whose address is 4210 Summerton Dr., Byram, MS.

154. Plaintiff Monroe Miller is an adult resident citizen of Hinds County, Mississippi whose address is 4210 Summerton Drive, Byram, MS.

155. Plaintiff Bill Davis C/F Susan Miller is an adult resident citizen of Perry County, Mississippi whose address is 1205 Pine Road, Corinth, MS.

156. Plaintiff Bill Davis, C/F Blaklee D. Miller is an adult resident citizen of Perry County, Mississippi whose address is 1205 Pine Road, Corinth, MS.
157. Plaintiff Joseph Chris Miller is an adult resident citizen of Warren County, Mississippi whose address is 410 Ridgewood Dr., Vicksburg, MS.
158. Plaintiff William L. Milstead is an adult resident citizen of Hinds County, Mississippi whose address is 175 Green Forest Dr., Clinton, MS.
159. Plaintiffs John H. & Betty Ann Moody are adult resident citizens of Warren County, Mississippi whose address is 5258 Fisher Ferry Road, Vicksburg, MS.
160. Plaintiff Donald Moore is an adult resident citizen of Adams County, Mississippi whose address is P.O. Box 1074, Washington, MS.
161. Plaintiff Maurine Moore is an adult resident citizen of Hinds County, Mississippi whose address is 101 Bailes Ridge Rd. Clinton, MS.
162. Plaintiff Bobbie Mortimer is an adult resident citizen of Rankin County, Mississippi whose address is 604 Boatmans Cove, Brandon, MS.
163. Plaintiff James T. Moser, Sr. is an adult resident citizen of Hinds County, Mississippi whose address is 3834 Midway Road, Raymond, MS.
164. Plaintiff Isadore Myers is an adult resident citizen of Hinds County, Mississippi whose address is 1126 Aberdeen Street, Jackson, MS.
165. Plaintiff David H. Myers is an adult resident citizen of Warren County, Mississippi whose address is 520 Inglewood Dr., Vicksburg, MS.
166. Plaintiff Jerry E. Nichols is an adult resident citizen of Perry County, Mississippi whose address is 24024 Hwy 42 East, Richton, MS.

167. Plaintiff Tim Norris is an adult resident citizen of Hinds County, Mississippi whose address is 5026 Raintree Drive, Byram, MS.

168. Plaintiffs Jeancenne(esq) & Larry Pacific are adult resident citizens of Jones County, Mississippi whose address is P. O. Box 1282, Laurel, MS.

169. Plaintiff Jimmy Painter is an adult resident citizen of Rankin County, Mississippi whose address is 107 W. Waterwood Dr., Brandon, MS.

170. Plaintiffs Chris & Margie Parker are adult resident citizens of Madison County, Mississippi whose address is 606 Winteridge Court, Ridgeland, MS.

171. Plaintiff Linda D. Parker is an adult resident citizen of Warren County, Mississippi whose address is 21537 MS. Hwy 465, Vicksburg, MS.

172. Plaintiff Lou Parker is an adult resident citizen of Warren County, Mississippi whose address is 21537 Highway 465, Vicksburg, MS.

173. Plaintiff Kamlesh Patel is an adult resident citizen of Jones County, Mississippi whose address is 429 Fairway Place, Laurel, MS.

174. Plaintiff John W. Patrick is an adult resident citizen of Scott County, Mississippi whose address is 3983 Hwy. 483, Morton, MS.

175. Plaintiff William C. Peoples is an adult resident citizen of Rankin County, Mississippi whose address is 10 Bastille St. Brandon, MS.

176. Plaintiff William W. Perkins is an adult resident citizen of Lincoln County, Mississippi whose address is 415 Natchez Ave., Brookhaven, MS.

177. Plaintiff Shannon W. Pigott is an adult resident citizen of Forrest County, Mississippi whose address is 57 Madison Pl., Flattiesburg, MS.

178. Plaintiff Herman H. Piner is an adult resident citizen of Rankin County, Mississippi whose address is 213 Crescent Court, Brandon, MS.

179. Plaintiffs Melvin & Elizabeth C. Priester are adult resident citizens of Hinds County, Mississippi whose address is 371 Edgewood Terrace, Jackson, MS.

180. Plaintiff Joe Pullen is an adult resident citizen of Yalobusha County, Mississippi whose address is 4226 CR225, Water Valley, MS.

181. Plaintiff Thomas M. (Tom) Purnell is an adult resident citizen of Hinds County, Mississippi whose address is 3779 Lorance Rd, Clinton, MS.

182. Plaintiffs Barclay & Jan Rader are adult resident citizens of Madison County, Mississippi whose address is 157 Brookstone Way, Madison, MS.

183. Plaintiff Gerald Raleigh is an adult resident citizen of Douglas County, Georgia whose address is 6708 Brookfield Way, Douglasville, GA.

184. Plaintiff Howard T. Richardson is an adult resident citizen of Rankin County, Mississippi whose address is 39 Westridge Dr., Brandon, MS.

185. Plaintiff Richard Thomas Rodenbaugh is an adult resident citizen of Madison County, Mississippi whose address is 555 Dogwood Dr., Madison, MS.

186. Plaintiff Allan S. Rohr is an adult resident citizen of Jackson County, Mississippi whose address is 9912 Mockingbird Cr., Ocean Springs, MS.

187. Plaintiff Darold Rutland is an adult resident citizen of Hinds County, Mississippi whose address is 1595 Beasley Drive, Jackson, MS.

188. Plaintiff Shirley Rutland is an adult resident citizen of Hinds County, Mississippi whose address is 1595 Beasley Dr., Terry, MS.

189. Plaintiff Kevin Sanders is an adult resident citizen of Gwinnett County, Georgia whose address is 5496 Clover Rise Lane, Norcross, GA.

190. Plaintiff Mary M. Savell is an adult resident citizen of Rankin County, Mississippi whose address is 284 East Meade Street, Pearl, MS.

191. Plaintiff J.D. Shaffer is an adult resident citizen of Clay County, Mississippi whose address is 10622 Lake Grove Road, West Point, MS.

192. Plaintiff Jason Lee Shelton is an adult resident citizen of Lee County, Mississippi whose address is P.O. Box 1362, Tupelo, MS.

193. Plaintiff LaShane Smith is an adult resident citizen of Hinds County, Mississippi whose address is 1400 Pine Grove Rd, Jackson, MS.

194. Plaintiff Mark Smith is an adult resident citizen of Lincoln County, Mississippi whose address is 109 Harper Street, Brookhaven, MS.

195. Plaintiff Marilyn Ann Smith is an adult resident citizen of Lincoln County, Mississippi whose address is 1297 California Rd., Brookhaven, MS.

196. Plaintiff John Eric Smith is an adult resident citizen of Lincoln County, Mississippi whose address is 1297 California Rd, Brookhaven, MS.

197. Plaintiff Elvin Smith is an adult resident citizen of Lincoln County, Mississippi whose address is 1287 California Camp Road, Brookhaven, MS.

198. Plaintiffs Tommy & Jan Smith are adult resident citizens of Rankin County, Mississippi whose address is 667 Spring Lake Dr., Pearl, MS.

199. Plaintiffs Reginald & Donna Smith are adult resident citizen of Mississippi whose address is No address in File.

200. Plaintiff Rita Bartlow Smith is an adult resident citizen of McCormick County, South Carolina whose address is Rt. 1 Box 1-F, Madoc, SC.

201. Plaintiff Leland A. Speed, d/b/a Speed Corp is an adult resident citizen of Hinds County, Mississippi whose address is 113 Briarwood Dr., Jackson, MS.

202. Plaintiff John E. (Buddy) Spring is an adult resident citizen of Madison County, Mississippi whose address is 308 Rutherglen Way, Madison, MS.

203. Plaintiff Frederick Stanton is an adult resident citizen of Lincoln County, Mississippi whose address is 408 East Cherokee St., Brookhaven, MS.

204. Plaintiffs Andy & Karen Stone are adult resident citizens of Scott County, Mississippi whose address is P.O. Box 191, Ludlow, MS.

205. Plaintiff Joseph G. Strickland is an adult resident citizen of Warren County, Mississippi whose address is 113 Maison Rue, Vicksburg, MS.

206. Plaintiff Edith Strub is an adult resident citizen of Hinds County, Mississippi whose address is 307 Monterey Dr., Clinton, MS.

207. Plaintiff Erich M. Sturgis is an adult resident citizen of Harris County, Texas whose address is 2119 Bellmeade Road, Houston, TX.

208. Plaintiff George M. Sturgis is an adult resident citizen of Hinds County, Mississippi whose address is 2525 Eastover Drive, Jackson, MS.

209. Plaintiff Yvette N. Sturgis is an adult resident citizen of Hinds County, Mississippi whose address is 2525 Eastover Drive, Jackson, MS.

210. Plaintiff Robert S. Tarver is an adult resident citizen of Rankin County, Mississippi whose address is 6478 Grants Ferry Road, Brandon, MS.

211. Plaintiff Cecil Thomas is an adult resident citizen of Rankin County, Mississippi whose address is 145 Sylvan, Richland, MS.
212. Plaintiff V. T. "Bill" Vallas is an adult resident citizen of Rankin County, Mississippi whose address is P. O. Box 4444, Brandon, MS.
213. Plaintiff J. Lyn Vallas is an adult resident citizen of Rankin County, Mississippi whose address is P. O. Box 4444, Brandon, MS.
214. Plaintiff Wyndell A. Varner is an adult resident citizen of Madison County, Mississippi whose address is P. O. Box 935, Madison, MS.
215. Plaintiffs James and Helen Walker are adult resident citizens of Harrison County, Mississippi whose address is 620 McIntosh, Gulfport, MS.
216. Plaintiffs John L. & Stella Walker are adult resident citizens of Hinds County, Mississippi whose address is P.O. 22849, Jackson, MS.
217. Plaintiff Edward K. Walker is an adult resident citizen of Jones County, Mississippi whose address is 18 Boss Clinton Rd, Ellisville, MS.
218. Plaintiff Rickey Warner is an adult resident citizen of Hinds County, Mississippi whose address is 6225 Tanglewood Dr., Jackson, MS.
219. Plaintiff Janet Watkins is an adult resident citizen of Rankin County, Mississippi whose address is 114 Sweetgum Road, Brandon, MS.
220. Plaintiffs Katherin & Clarice Weatherby are adult resident citizens of Attala County, Mississippi whose address is Route 1, Box 57-L, Sallis, MS.
221. Plaintiff Kenneth Webb is an adult resident citizen of Lee County, Mississippi whose address is P.O. Box 425, Bolden, MS.

222. Plaintiff David O. Weed is an adult resident citizen of Hinds County, Mississippi whose address is 1608 Melrose Pl., Clinton, MS.
223. Plaintiff John M. Wellons Jr. is an adult resident citizen of Clay County, Mississippi whose address is 792 Waddell, Cedar Bluff, MS.
224. Plaintiff Theodore West is an adult resident citizen of Adams County, Mississippi whose address is P. O. Box 803, Natchez, MS.
225. Plaintiff Jon S. Widener is an adult resident citizen of Jones County, Mississippi whose address is P. O. Box 2909, Laurel, MS.
226. Plaintiff Hosie Wiggs, by and through Janet S. Wiggs is an adult resident citizen of Simpson County, Mississippi whose address is 847 Steelmill Rd. Mendenhall, MS.
227. Plaintiff Johnny F. Wiginton is an adult resident citizen of Lee County, Mississippi whose address is 2611 Hampton Ave, Tupelo, MS.
228. Plaintiff James G. Williams is an adult resident citizen of Hinds County, Mississippi whose address is 4539 Redwood Drive, Jackson, MS.
229. Plaintiff Susan Williams is an adult resident citizen of Lee County, Mississippi whose address is 109 Drive 937, Tupelo, MS.
230. Plaintiff Roy E. Williams is an adult resident citizen of Rankin County, Mississippi whose address is 302 Southwind Dr., Richland, MS.
231. Plaintiff Robert Williams Jr. is an adult resident citizen of Issaquena County, Mississippi whose address is P.O. Box 173, Mayersville, MS.

232. Plaintiff Katrina Williams, C/F Franklin D. Williams is an adult resident citizen of Madison County, Mississippi whose address is 136 Cypress Lake Blvd. Madison, MS.

233. Plaintiff Katrina Williams, C/F Jessica Williams is an adult resident citizen of Madison County, Mississippi whose address is 136 Cypress Lake Blvd, Madison, MS.

234. Plaintiff Katrina Williams & Erma Bolton are adult resident citizens of Madison County, Mississippi whose address is 136 Cypress Lake Blvd, Madison, MS.

235. Plaintiff Dianne Wilson is an adult resident citizen of Scott County, Mississippi whose address is 1323 Steadman Rd., Morton, MS.

236. Plaintiff Marcus Withers, by and through Rita Withers is an adult resident citizen of Scott County, Mississippi whose address is 222 Leon Harrell Rd, Morton, MS.

237. Plaintiffs Amanda and Mark Wootten are adult resident citizens of Madison County, Mississippi whose address is 338 Indian Gate Circle, Ridgeland, MS.

238. Plaintiff John Yarbrough is an adult resident citizen of Winston County, Mississippi whose address is 1012 Childs Road, Louisville, MS.

239. Plaintiff Gene Abbott is an adult resident citizen of Warren County, Mississippi whose address is P.O. Box 820126, Vicksburg, MS.

240. Plaintiff Larry Andrews is an adult resident citizen of Hinds County, Mississippi whose address is 257 Memory Oaks Drive, Raymond, MS.

241. Plaintiff Gussie Ashley is an adult resident citizen of Lincoln County, Mississippi whose address is Post Office Box 617, Brookhaven, MS.

242. Plaintiffs Jeannie & Jerry Barrier are adult resident citizens of Yazoo County, Mississippi whose address is P.O. Box 51, Yazoo City, MS.

243. Plaintiff Diana Bonds is an adult resident citizen of Hinds County, Mississippi whose address is P.O.Box 3769, Jackson, MS.

244. Plaintiff Talmadge Braddock is an adult resident citizen of Hinds County, Mississippi whose address is 109 N. State St, Jackson, MS.

245. Plaintiff Suzanne Jackson Braddock is an adult resident citizen of Warren County, Mississippi whose address is 2002 Highland Place, Vicksburg, MS.

246. Plaintiff A.R. Brownlee is an adult resident citizen of Collin County, Texas whose address is 4242 N. Capistrano #196, Dallas, Tx.

247. Plaintiff Mary Bryant is an adult resident citizen of Hinds County, Mississippi whose address is 1017 Meadowbrook Road, Jackson, MS.

248. Plaintiff Joseph W. Burnett is an adult resident citizen of Lafayette County, Mississippi whose address is P.O. Box 1418, Oxford, MS.

249. Plaintiff Kelsie Carey is an adult resident citizen of Rankin County, Mississippi whose address is 320 Marilyn Drive, Pearl, MS.

250. Plaintiff Brooks Cheatham is an adult resident citizen of Hinds County, Mississippi whose address is 5603 Magnolia Drive, Jackson, MS.

251. Plaintiff Robert Christian is an adult resident citizen of Greene County, Georgia whose address is 1001 Peachtree Court, Greensboro, Ga.

252. Plaintiff Curtis Cockrell is an adult resident citizen of Lee County, Mississippi whose address is 1102 Van Buren, Tupelo, MS.
253. Plaintiff Woody P. Davis is an adult resident citizen of Lauderdale County, Mississippi whose address is 500 Hwy 39 N Bldg B., Meridian, MS.
254. Plaintiff Virgie B. Davis is an adult resident citizen of Madison County, Mississippi whose address is 248 Locust Lane Apt. 335, Madison, MS.
255. Plaintiff Tony Dicus is an adult resident citizen of Rankin County, Mississippi whose address is 357 Evergreen Way, Brandon, MS.
256. Plaintiff David Duncan is an adult resident citizen of Lee County, Mississippi whose address is P.O. Box 1175, Tupelo, MS.
257. Plaintiff John Eaves, Jr. is an adult resident citizen of Madison County, Mississippi whose address is 753 North Old Canton Road, Canton, MS.
258. Plaintiff Michael Engle is an adult resident citizen of Warren County, Mississippi whose address is 2008 Highland Place, Vicksburg, MS.
259. Plaintiff Lynn Featherly is an adult resident citizen of Fulton County, Georgia whose address is Box 1194, Roswell, Ga.
260. Plaintiff Dennis K. Flynn is an adult resident citizen of Rankin County, Mississippi whose address is 563 Thongate Court, Brandon, MS 39047.
261. Plaintiff Hugh B. French is an adult resident citizen of Hinds County, Mississippi whose address is 10 Robin Lane, Raymond, MS.
262. Plaintiff Jocelyn Gibson is an adult resident citizen of Oktibbeha County, Mississippi whose address is 103 Eudora Welty Apt. 06, Starkville, MS.



263. Plaintiff Eric Gilkey is an adult resident citizen of Madison County, Mississippi whose address is 599 Welch St, Canton, MS.

264. Plaintiff Horace Grantham is an adult resident citizen of Hinds County, Mississippi whose address is 122 Windy Hill Cove, Raymond, MS.

265. Plaintiff Cedrick Grizzell is an adult resident citizen of Hinds County, Mississippi whose address is 164 Mayfair Drive, Jackson, MS.

266. Plaintiff Chuck Guess is an adult resident citizen of Madison County, Mississippi whose address is 200 Woodgreen Drive #30, Madison, MS.

267. Plaintiff Shirley Gussio is an adult resident citizen of Warren County, Mississippi whose address is 915 Lakewood, Vicksburg, MS.

268. Plaintiff Carolina Campbell Hall is an adult resident citizen of Madison County, Mississippi whose address is 254 Rolling Meadow, Ridgeland, MS.

269. Plaintiff Sylvia Chapman Hall is an adult resident citizen of Madison County, Mississippi whose address is 254 Rolling Meadow, Ridgeland, MS.

270. Plaintiff Charles Hall is an adult resident citizen of Madison County, Mississippi whose address is 254 Rolling Meadows, Ridgeland, MS.

271. Plaintiffs Faye & Tommy Hill are adult resident citizens of Lincoln County, Mississippi whose address is 95 Sandlewood Trail, Brookhaven, MS.

272. Plaintiff India Hollingsworth is an adult resident citizen of Hinds County, Mississippi whose address is 103 Napa Valley Drive, Clinton, MS.

273. Plaintiff John Hunsberger is an adult resident citizen of Prince William County, Virginia whose address is 10822 Campaign Court, Manassas, VA.

274. Plaintiff Vincent Hunt is an adult resident citizen of Pike County, Mississippi whose address is Rt. 2 Box 991, McCall Creek, MS.

275. Plaintiff Gloria Johnson is an adult resident citizen of Hinds County, Mississippi whose address is P.O. Box 20492, Jackson, MS.

276. Plaintiff Barbara Johnson is an adult resident citizen of Hinds County, Mississippi whose address is 280 Deason Drive, Jackson, MS.

277. Plaintiff Vanessa T. Johnson is an adult resident citizen of Jefferson County, Mississippi whose address is P.O. Box 576, Fayette, MS.

278. Plaintiff Franklin Johnson is an adult resident citizen of Leake County, Mississippi whose address is 1901 Hwy 488, Carthage, MS.

279. Plaintiff Lewis Johnson is an adult resident citizen of Island County, Washington whose address is 1053 Mountain Circle, Oak Harbour, Wa.

280. Plaintiff Edward Jussley is an adult resident citizen of Hinds County, Mississippi whose address is 101 Twilight Road, Clinton, MS.

281. Plaintiff Joe Kuse is an adult resident citizen of Copiah County, Mississippi whose address is P.O. Box 39059, Crystal Springs, MS.

282. Plaintiff Marcus Lewis is an adult resident citizen of Hinds County, Mississippi whose address is 5029 Tulane Drive, Jackson, MS.

283. Plaintiff Gwendolyn Loper is an adult resident citizen of Hinds County, Mississippi whose address is 1518 Schoolview, Jackson, MS.

284. Plaintiff Wayne Martin is an adult resident citizen of Hinds County, Mississippi whose address is 6125 Mossline Drive, Jackson, MS.

285. Plaintiff Chad Mask is an adult resident citizen of Hinds County, Mississippi whose address is 200 S. Lamar Street, Jackson, MS.

286. Plaintiff Nicholas McCalip is an adult resident citizen of Greenville County, South Carolina whose address is 209 Spring Lake Loop, Simpsonville, SC.

287. Plaintiff Rose McGowan is an adult resident citizen of Hinds County, Mississippi whose address is 751 Glen Cross Dr. Apt. F32, Jackson, MS.

288. Plaintiff A.J. McGregor is an adult resident citizen of Madison County, Mississippi whose address is 52 Camelia Drive, Madison, MS.

289. Plaintiff Albert Metts is an adult resident citizen of Harrison County, Mississippi whose address is 242 Lynwood Drive, Gulfport, MS.

290. Plaintiff Sandra Mitchell is an adult resident citizen of Madison County, Mississippi whose address is 604 Ralde Circle, Ridgeland, MS.

291. Plaintiff John Q. Morgan is an adult resident citizen of Hinds County, Mississippi whose address is 202 Stonegate Drive, Clinton, MS.

292. Plaintiff Michael Wayne Murphree is an adult resident citizen of Hinds County, Mississippi whose address is 2109 T.V. Road, Jackson, MS.

293. Plaintiff Don Nations is an adult resident citizen of Lincoln County, Mississippi whose address is P.O. Box 698, Brookhaven, MS.

294. Plaintiff Ethyl Parkes is an adult resident citizen of Oakland County, Michigan whose address is 1737 Timson Lane, Bloomfield Hills, MI.

295. Plaintiff Sharon Pickering is an adult resident citizen of Rankin County, Mississippi whose address is 315 Allison Place, Brandon, MS.

296. Plaintiff Linda Pilgrim is an adult resident citizen of Madison County, Mississippi whose address is 675 Ralde Circle, Ridgeland, MS.

297. Plaintiff Herbert Rubin is an adult resident citizen of Cook County, Illinois whose address is 2800 Lake Shore Drive Apt 2612, Chicago, IL.

298. Plaintiff Jean Sain is an adult resident citizen of Hinds County, Mississippi whose address is 5229 Waynceland Drive, Jackson, MS.

299. Plaintiff Jerry Sandifer is an adult resident citizen of Sevier County, Tennessee whose address is 3323 Mountain Lakes Way, Sevierville, Tn.

300. Plaintiff Jonathon Shelton is an adult resident citizen of Lee County, Mississippi whose address is P.O. Box 1362, Tupelo, MS.

301. Plaintiff Jimmy D. Shelton is an adult resident citizen of Lee County, Mississippi whose address is P.O. Box 1362, Tupelo, MS.

302. Plaintiff Karsten Simrall is an adult resident citizen of Warren County, Mississippi whose address is 5260 Highway 3, Redwood, MS.

303. Plaintiff Lonnie Mike Smith is an adult resident citizen of Lincoln County, Mississippi whose address is 521 Red Oak Drive, Brookhaven, MS.

304. Plaintiff Neal Smith is an adult resident citizen of Rankin County, Mississippi whose address is 119 Sunset Drive, Florence, MS.

305. Plaintiff Jackie Soper is an adult resident citizen of Rankin County, Mississippi whose address is 3212 Crafton Street, Pearl, MS.

306. Plaintiff Baker Tadlock is an adult resident citizen of Madison County, Mississippi whose address is 3245 Brandywine Drive, Madison, MS.

307. Plaintiff Virginia Thomas is an adult resident citizen of Hinds County, Mississippi whose address is 54 Woodridge Place, Jackson, MS.

308. Plaintiff John Thomas is an adult resident citizen of Pike County, Mississippi whose address is Post Office Box 1365, McComb, MS.

309. Plaintiff Scott Thompson is an adult resident citizen of Rankin County, Mississippi whose address is 95 Fern Valley Road, Brandon, MS.

310. Plaintiff Patsy Turner is an adult resident citizen of Sunflower County, Mississippi whose address is 130 Front Street, Indianola, MS.

311. Plaintiff Todd Watkins is an adult resident citizen of Rankin County, Mississippi whose address is P.O. Box 116, Pelahatchie, MS.

312. Plaintiff Henry Whitfield is an adult resident citizen of Hinds County, Mississippi whose address is 445 Brookwood Estates Drive, Jackson, MS.

313. Plaintiff Barbara Williams is an adult resident citizen of Hinds County, Mississippi whose address is 608 Green Court, Byram, MS.

314. Plaintiff Albert Wilson is an adult resident citizen of Hinds County, Mississippi whose address is 519 Benning Road, Jackson, MS.

315. Plaintiff Mary Quana Winders is an adult resident citizen of Lee County, Mississippi whose address is 104 Old Natchez Trace, Saltillo, MS.

### **III. Parties Defendant**

316. Defendant, Bernard Ebbers, ("Ebbers") is, upon information and belief, an adult resident citizen of Lincoln County, Mississippi, who may be served with process at this address of 934 Church Street, Brookhaven, Mississippi. Defendant Ebbers was President, Chief Executive Office and a Director of WorldCom until approximately April 29, 2002, when he was forced to resign from the company. Ebbers is scheduled for criminal trial in November of 2004.

317. Defendant Scott Sullivan, ("Sullivan") is, upon information and belief, an adult resident of the State of Florida, who may be served with process at his address of 6318 Woodbury Road, Boca Raton, Florida pursuant to the Mississippi Long Arm Statute, Miss. Code Ann. § 11-11-11. Defendant Sullivan was Chief Financial Officer and a Director of WorldCom until June 25, 2002, when he was terminated by the company. Also, between April 30, 2002 and June 25, 2002, Defendant Sullivan served as Executive Vice President of WorldCom. Sullivan plead "Guilty" to

318. Defendant, David F. Meyers, ("Meyers") is, upon information and belief, an adult resident citizen of Hinds County, Mississippi, who may be served with process at 142 Sunflower Road, Jackson, Mississippi. Defendant Meyers was Controller and a Senior Vice President of WorldCom until June 25, 2002, when he resigned his positions with the company.

319. Defendant, Buford Yates, Jr., ("Yates") is, upon information and belief, an adult resident citizen of Rankin County, Mississippi, who may be served with process at

his address of 169 Grants Ferry Road, Brandon, Mississippi. Defendant Yates was Director of General Accounting of WorldCom at all times pertinent to this Complaint.

320. Defendant, John Sidgmore, ("Sidgmore") is, upon information and belief, an adult resident citizen of the State of Maryland, who may be served with process at his address of 10 Greentree Court, Bethesda, Maryland pursuant to the Mississippi Long Arm Statute, Miss. Code Ann. § 11-11-11. Defendant Sidgmore was a Director of WorldCom and served as Vice Chairman of the Board of Directors at all times pertinent to this Complaint.

321. Defendant, Betty L. Vinson, ("Vinson"), is, upon information and belief, an adult resident of Madison County, Mississippi, who may be served with process at her address of 53 Chestnut Drive, Madison, Mississippi. Defendant Vinson was on all relevant occasions a certified public accountant and employee in WorldCom's General Accounting Department. In or about January, 2002, Defendant Vinson was promoted to Director of Management Reporting.

322. Defendant Troy M. Normand ("Normand") is, upon information and belief, an adult resident of Madison County, Mississippi, who may be served with process at his address of 320 Westwood Court, Madison, Mississippi. Defendant Normand was on all relevant occasions a certified public accountant and employee in WorldCom's General Accounting Department. In or about January, 2002, Defendant Normand was promoted to Director of Legal Entity Accounting.

323. Defendant, James C. Allen, ("Allen") is, upon information and belief, an adult resident citizen of the State of Colorado, who may be served with process at this

address of 2792 Uinta Street, Denver Colorado pursuant to the Mississippi Long Arm Statue, Miss. Code Ann. § 11-11-11. At all times pertinent to this complaint, Defendant Allen was a Director of WorldCom and a member of the Audit Committee of the Board of Directors.

324. Defendant, Judith Areen, ("Areen") is, upon information and belief, an adult resident citizen of the District of Columbia, who may be served with process at her address of 4451 Q Street Northwest, Washington, D.C. pursuant to the Mississippi Long Arm Statue, Miss. Code. § 11-11-11. At all times pertinent to this Complaint, Defendant Areen was a Director of WorldCom and a member of the Audit Committee of the Board of Directors.

325. Defendant, Max F. Bobbitt, ("Bobbitt"), at all times pertinent to this Complaint, was a Director of WorldCom and Chairman of the Audit Committee of the Board of Directors. Defendant Bobbitt may be served with process pursuant to the Mississippi Long Arm Statue, Miss. Code Ann. § 11-11-11.

326. Defendant, Francesco Galesi, ("Galesi") is, upon information and belief, an adult resident citizen of the State of New York, who may be served with process at his address of 435 2<sup>nd</sup> Street, #23C, New York, New York pursuant to the Mississippi Long Arm Statue, Miss. Code Ann. § 11-11-11. At all times pertinent to this Complaint, Defendant Galesi was a Director of WorldCom and a member of the audit Committee of the Board of Directors.

327. Defendant, Stiles A. Kellett, Jr., ("Kellett") is, upon information and belief, an adult resident of the State of Georgia, who may be served with process at his

address of 3188 Verdun Drive, Atlanta, Georgia pursuant to the Mississippi Long Arm Statute, Miss. Code Ann. § 11-11-11. At all times pertinent to this Complaint, Defendant Kellett was a Director of WorldCom and Chairman of the Compensation Committee of the Board of Directors.

328. Defendants Ebbers, Sullivan, Myers, Yates, Sidgmore, Allen, Areen, Bobbitt, Galesi, and Kellett are hereinafter collectively referred to as the "WorldCom Defendants."

329. Defendant, Arthur Andersen, LLP, ("Andersen") is a foreign limited liability partnership authorized to do and doing business within the State of Mississippi. Andersen has designated Timothy R. Cantrell as its registered agent for service of process, who may be served at his address of 188 East Capitol, Ste. 1300, Jackson, Mississippi 39201-2186. At all times pertinent to this Complaint, Defendant Andersen provided auditing and accounting services to WorldCom, including undertaking audits of WorldCom's year end financial statements and reviews of the company's quarterly financial statements.

330. Defendant Andersen UK is a British public accounting firm and a member of Anderson Worldwide SC. At all times pertinent to this Complaint, Defendant Andersen UK may be served at its principal office in England pursuant to the Hague Convention and/or the Mississippi Long Arm Statute, Miss. Code Ann. § 11-11-11.

331. Defendant Andersen Worldwide SC is a Swiss Society Cooperative and serves as the umbrella organization for its member firms worldwide. Defendants Anderson and Andersen UK are member firms of Andersen Worldwide SC. Through

Defendants Andersen and Andersen UK are member firms of Andersen Worldwide SC provided auditing and accounting services to WorldCom at all times pertinent to this Complaint. Defendant Andersen Worldwide SC may be served at Binzmuhlestrasse 14 8050, Zurich, Switzerland pursuant to the Mississippi Long Arm Statute, Miss. Code Ann. § 11-11-11 and/or the Hague Convention.

332. Defendant Mark Schoppe ("Schoppe") is, upon information and belief, an adult resident citizen of the State of Maryland, who may be served with process at his address of 9476 Fens Hollow, Laurel, Maryland pursuant to the Mississippi Long Arm Statute, Miss. Code Ann. § 11-11-11. At all times pertinent times to this Complaint, Defendant Schoppe was a certified public accountant and senior Andersen partner responsible for the reviews and audits of WorldCom's financial records and statements. Schoppe was the audit engagement partner in connection with Andersen's audits of WorldCom's financial statements for 2000 and prior years. Defendant Schoppe was the audit engagement partner in connection with Andersen's audits of WorldCom's financial statements for 2000 and prior years.

333. Defendant Melvin Dick ("Dick") is, upon information and belief, an adult resident citizen of the State of Idaho, who may be served with process at his address of 6315 Bottle Bay Road., Sagle, Idaho pursuant to the Mississippi Long Arm Statute, Miss. Code Ann. § 11-11-11. At all times pertinent to this Complaint, Defendant Dick was a certified public accountant and senior Andersen partner responsible for the reviews and audits of WorldCom's financial records and statements. Defendant Dick was the audit

engagement partner in connection with Andersen's audits of WorldCom's financial statements for 2001.

334. Defendants, Andersen, Andersen UK, Andersen Worldwide SC, Schoppe and Dick, are hereinafter collectively referred to as "the Arthur Andersen Defendants."

335. John Doe Defendants one (1) through ten (10) are those additional, but currently unknown Andersen employees who were at all pertinent times responsible for the reviews and audits of WorldCom's financial statements and records.

336. Defendant Salomon Smith Barney, Inc. ("Salomon") is a foreign corporation authorized to do and doing business within the State of Mississippi. Defendant Salomon's agent for service of process is CT Corporation Systems, which may be served with process at 631 Lakeland E. Drive, Flowood, Mississippi. Defendant Salomon is a subsidiary of Defendant Citigroup, Inc.

337. Defendant Citigroup, Inc. ("Citigroup") is a foreign corporation authorized to do and doing business within the State of Mississippi. Citigroup's agent for service of process is CT Corporation Systems, which may be served with process at 631 Lakeland E. Drive, Flowood, Mississippi. Citigroup is the corporate parent and 100% owner of Defendant Salomon, and an underwriter of the WorldCom bonds discussed herein.

338. Defendant Jack Grubman ("Grubman") is, upon information and belief, a domiciliary of the State of New York and may be served with process at his address of 270 East Avenue #10 S, New York, New York pursuant to the Mississippi Long Arm Statute, Miss. Code Ann. § 11-11-11. Defendant Grubman was the primary

telecommunications industry analyst at Salomon from the fall of 1994 until August 15, 2002, when he resigned.

339. Defendant Sandord Weill ("Weill") is, upon information and belief, a domiciliary of the State of New York and may be served with process at his address of 388 Greenwich Street, New York, New York pursuant to the Mississippi Long Arm Statute § 11-11-11. Defendant Weill was the chairman and Chief Executive of Defendant Citigroup at all times pertinent to this Complaint.

340. Defendant J.P. Morgan Chase & Co. is a foreign corporation that may be served at its principal office, which is located at 270 Park Avenue, New York, New York, pursuant to the Mississippi Long Arm Statute, Miss. Code Ann. § 11-11-11. Defendant J.P. Morgan Chase & Co. and J.P. Morgan Securities, Inc. are referred to collectively herein as "J.P. Morgan."

341. Defendant J.P. Morgan Securities, Inc. is a subsidiary corporation of Defendant J.P. Morgan Chase & Co. and may be served at its principal office, which is located at 60 Wall Street, New York, New York, pursuant to the Mississippi Long Arm statute, Miss. Code Ann. § 11-11-11. Defendant J.P. Morgan Chase & Co. and J.P. Morgan Securities, Inc. are referred to collectively herein as "J.P. Morgan."

342. Defendant ABN/AMRO Incorporated, ("ABN/AMRO") is a foreign corporation that may be served at its principal office, which is located at 11 Wall Street, New York, New York, pursuant to the Mississippi Long Arm Statute, Miss Code Ann. § 11-11-11. Defendant ABN/AMRO was an underwriter of the WorldCom bonds discussed herein.

343. Defendant Bank of America Corporation is a foreign corporation that may be served at its principal office, which is located at 40 East 52<sup>nd</sup> Street, New York, New York, pursuant to the Mississippi Long Arm Statute, Miss. Code Ann. § 11-11-11. Bank of America was an underwriter of the WorldCom bonds discussed herein.

344. Defendant Banc of America Securities LLC is a foreign subsidiary Corporation of Defendant Bank of America Corporation and may be served with process at its principal office, which is located at 9 West 57<sup>th</sup> Street, New York, New York, pursuant to the Mississippi Long Arm Statute, Miss. Code Ann. § 11-11-11. Defendants Bank of America Corporation and Banc of America Securities LLC are referred to collectively herein as "Bank of America."

345. Defendant Deutsche Bank AG is a foreign corporation that may be served at its principal office in Germany pursuant to the Hague Convention and/or the Mississippi Long Arm Statute, Miss. Code Ann. § 11-11-11. Deutsche Bank was an underwriter of WorldCom bonds discussed herein.

346. Defendant Deutsche Bank Alex. Brown Inc. is a subsidiary corporation of Defendant Deutsche Bank AG and may be served at its principal place of business, which is located at 1 South Street, Baltimore, Maryland, pursuant to the Mississippi Long Arm Statute, Miss. Code Ann. § 11-11-11. Defendants Deutsche Bank AG and Deutsche Bank Alex. Brown Inc. are referred to collectively herein as "Deutsche Bank."

347. Defendants Salomon, Citigroup, J.P. Morgan, J.P. Morgan Securities, Inc., ABN/AMRO, Bank of America, Banc of America Securities LLC, Deutsche Bank and

Deutsche Bank Alex. Brown Inc. are, in pertinent part, referred to collectively as the "Underwriter Defendants" or the "Banks."

348. John Doe Defendants eleven (11) through twenty (20) are those additional underwriters of the WorldCom bonds discussed herein who are currently unknown.

#### **IV. Jurisdiction and Venue**

349. Jurisdiction is proper in this federal court for the following reasons:

- a. This action arises out of a tort or series of torts committed by Defendants in whole or part within the U.S. District Court, Southern District of Mississippi, Jackson Division.
- b. Federal Question Jurisdiction.

350. Venue is proper in United States District Court, Southern District of Mississippi, Jackson District, pursuant to Miss. Code Ann. § 11-11-11.V. Joinder of Claims and Parties.

351. Plaintiffs join each and all of their claims and remedies sought pursuant to Rule 18 of the Federal Rules of Civil Procedure and the Mississippi Rules of Civil Procedure. Each of the claims asserted herein should be tried in a single lawsuit to promote efficient resolution and avoid unnecessarily duplicative actions.

352. Plaintiffs join together to pursue this action pursuant to Rule 20 of the Federal Rules of Civil Procedure and the Mississippi Rules of Civil Procedure for the following reasons:

- a. Plaintiff assert rights to relief jointly, severally, or in the alternative which relate to matters arising out of the same transactions.

misrepresentations, occurrences or series of transactions or occurrences as set forth herein; and,

- b. Questions of law and fact common to all Plaintiffs will arise in this action.

353. Plaintiffs join each of the Defendants in this action pursuant to Rule 20 of the Federal Rules of Civil Procedure and the Mississippi Rules of Civil Procedure for the following reasons:

- a. Plaintiffs assert against Defendants right to relief jointly, severally, or in the alternative which relate to matters arising out of the same transactions, misrepresentations, occurrences or series of transactions or occurrences as set forth herein; and,
- b. Questions of law and fact common to all Defendants will arise in this action.

## **VI. Factual Background**

### **A. WorldCom's Illegal Accounting and Auditing Practices**

#### **1. Hidden Costs and Bloated Reserves**

354. In 1998, WorldCom was the second largest telecommunications company in the world, having accomplished its phenomenal growth through a series of mergers and acquisitions. However, with each merger or acquisition, WorldCom avoided recording millions or even billions of dollars in costs in the periods in which they were actually incurred. In addition, WorldCom established bloated reserves, purportedly related to its

mergers and acquisitions, which the company would draw down in subsequent periods to offset operating expenses and artificially inflate earnings.

355. In early 2000, WorldCom's effort to acquire Sprint Communications was thwarted by the United States Justice Department, essentially ending the company's scheme of manipulating earnings through improper merger-and-acquisition-related accounting practices. Accordingly, WorldCom management concocted a new method of earnings manipulation.

## 2. Line Cost Capitalization

356. In previous years, WorldCom had entered into a number of long-term lease agreements with various telecommunications carriers to obtain the right to use their network of communication lines to serve customers who were not directly connected to WorldCom's network. Many of these leases required WorldCom to make fixed monthly payments over the full term of the lease, regardless of whether WorldCom actually used the leased network line. These lease costs are referred to as "line costs," and pursuant to Generally Accepted Accounting Principles ("GAAP") should be recorded as an operating expense on financial statements.

357. WorldCom, consistent with GAAP standards, had accounted for line costs as an operating expense on its income statements prior to 2000; however, by July, 2000, WorldCom's actual revenues were drastically declining and presenting a risk to the company's inflated stock price.

358. To avert a reduction in stock price, WorldCom senior management directed employees, including Defendants Yates, Vinson and Normand, in late 2000 to

reduce the company's line cost expenses, and in identical mounts, reduce various reserve accounts. These reclassifications were not supported by documentation or proper business rationale and were in violation of GAAP.

359. In and throughout 2001, WorldCom senior management directed employees, including Defendants Yates, Vinson, and Normand, to manipulate earnings by improperly reclassifying line cost expenses as capital expenditures, which are assets on the company's balance sheet and depreciated over extended periods of time. These reclassifications were not supported by documentation or proper business rationale and were in violation of GAAP.

### 3. The Internal Audit

360. The WorldCom Internal Audit Department was primarily responsible for the periodic review, through a formal data-gathering process, of information relating to aspects of the Company's operation and financial controls. The Internal Audit Department reported its findings and recommendations to Defendant Sullivan and the Audit Committee of the Board of Directors, which had overall responsibility for ensuring that the Company's system of internal controls operated efficiently.

361. On all pertinent occasions, Defendant Sullivan and the Audit Committee excessively limited the Internal Audit Department's focus on operational rather than financial auditing, thereby creating an environment in which financial statement fraud could go undetected. Among its many failures, the Internal Audit Department:

- a. failed to prepare an internal audit plan at the beginning of each fiscal year to identify its auditable units ("Audit Plain Universe");